

In The United States District Court  
for the District of Delaware

Kenneth L. Holland  
~Plaintiff~

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| FILED                                       |
| JAN 28 2008                                 |
| U.S. DISTRICT COURT<br>DISTRICT OF DELAWARE |

v/s

C.A. No., 05-464-(SLR)

Stanley Taylor, et al.,  
~Defendant's~

Answer to Defendant's Interrogatories and  
Production of Document and Things

- 1.) With respect to each and every claim in your Complaint relating to Sgt. Wilbur Justice, Counselor Kent Raymond, and Counselor Theresa DeMarco:
  - (a). Identify all facts that refute, relate to, or support your contentions;
  - (b). Identify the specific behavior or conduct that you allege that each of these three Defendants engaged in;
  - (c). Identify all persons with knowledge of such contention or facts;

(d). Identify all documents that reflect, ■ refer to, or relate to such contention or facts:

Response:

(a). Defendants in fact wrongfully sanctioned Plaintiff outside the requirements of law, Defendant's denied Plaintiff the right to be present at M.D.T. Board, Plaintiff suffered emotional injuries, and lost of wages.

(b) See the answers to (a) above.

(c) Mr. Tazleer, 4869 South Dupont Hwy, Dover, De. 19901.  
Dr. Alie, Infirmary, D.O.C., 1181 Paddock Rd, Smyrna, De 19977.  
Dr. Rodgers, Infirmary, D.O.C. 1181 Paddock, Rd, Smyrna, De 19977.

Wilbur Justice,  
Kent Raymond, 1 - 300 Waters St, Dover, De 19901  
Theresa DeMarco.

Mike Records, 875 Smyrna Landing Rd, Smyrna, De. 19977.  
Cindy Scala, information un-none, at this time.,

(d). Medical request, Nursing Assessment sheet, Nursing Care plan, Infirmary Observation notes, Interdisciplinary progress notes, Incoming chain review, Intra-system transfer information, physician's order sheet, Medical Memo, Medical Summary, Physical Assessment, Bayhealth Emergency sheet, Program Violation sheet, Work Rooster, Del c, title 11, § 4334, "there are other documents I wish to seek.",

- 2) Identify all documents which you intend to offer into evidence at the trial of this matter relating to Sgt. Wilbur Justice, Counselor Kent Raymond and Counselor Theresa DeMarco.

Response:

Please see answer to this question above to, [REDACTED] Responses to question 1.(d) .. .

- 3) Identify all persons having knowledge of the allegations in the complaint or answer whom you intend to call as witnesses at trial, excluding expert witnesses, relating to Sgt. Wilbur Justice, Counselor Kent Raymond, and Counselor Theresa DeMarco.

Response:

Please see the Response to question 1.(c) ., their may be additional witnesses added, when more information comes available.

- 4) Identify any physical evidence which relates in any way to any of the facts alleged in the complaint or answer, or which you intend to offer in evidence at trial, relating to Sgt. [REDACTED] Wilbur Justice, Kent Raymond and Theresa DeMarco.

Response:

Please see the Response to question 1., (d)., There may be additional evidence added when it comes available,

- 5) With regard to your claims against Sgt. Wilbur Justice, Kent Raymond, Theresa DeMarco, Identify each expert you expect to call to testify as a witness at trial and state for each such expert, (i) the qualifications of the expert, (ii) the subject matter on which the expert is expected to testify, (iii) the substance of the facts and opinions to which the expert is expected to testify and (iv) the summary of the grounds for such opinion.

Response:

None at this time.,

- 6) Identify in detail the precise injury or harm you allege was sustained as a result of the allegations in the Complaint Relating to Sgt. Wilbur Justice, Kent Raymond, Theresa DeMarco, [REDACTED], [REDACTED]

Response:

Plaintiff sustained minor injuries from the assault and contracted Shingles from stress.

- 7) Describe any medical treatment you received as a result of the allegations in the Complaint relating to Sgt. Wilbur Justice, Kent Raymond, Theresa DeMarco, specifically addressing:
- (a) whether you requested any medical treatment at any DOC facility which you believe in any way resulted from the allegations in your complaint; and
- (b.) the date and method used for any request listed in subparagraph (a.) of this interrogatory.

Response:

- (a) Plaintiff had requested medical treatment at C.U.O.P. center for a un-known rash, which was in fact Shingles and "No" treatment after the assault by Defendant, Bramble,
- (b) On 9-26-04, Plaintiff was given Benadryl 25 mg  
On 9-28-04, Plaintiff was then given Zovirax 800 mg and 5x a day x 7 days, Darvocet 100 mg 3x a day.  
On 10-1-04, Darvocet increased to 5x a day.  
On 10-5-04, Darvocet and Zovirax 800 treatment completed.  
On 9-29-04, Plaintiff [REDACTED] had to be placed on close observation.

- 8) State whether you filed a complaint or grievance at the correctional institution or with the Department of Correction about the subject matter of each and every claim in your Complaint as they relate to Sgt. Wilbur Justice, Kent Raymond and Theresa DeMarco. If so, when were they filed, with whom were they filed, and what was the response? If not, why not?

Response:

Plaintiff filed one grievance concerning this matter on 2-19-05., It was filed with the Department of Corrections, and the grievance was rejected as not grievable and expired filing period.

- 9) State the total amount of compensatory damages you are claiming against Sgt. Wilbur Justice, Kent Raymond, and Theresa DeMarco, and the computation used to arrive at the sum.

Response:

\$200,000., lost of wages from 7-1-04, to 11-26-04, to the sum of \$5,936.

\$1,000, a day, for each day Plaintiff was detained due to the unlawful sanction, to the sum of \$169,000., and for pain and suffering \$25,064..

10) Either prior to or subsequent to the alleged incident's referred to in your Complaint relating to Sgt. Wilbur Justice, Kent Raymond and Theresa DeMarco, have you ever suffered any injuries, illness or diseases in those portions of the body claimed by you to have been affected as alleged in the Complaint? If so, state:

(a). A description of the injuries or diseases you suffered, including the date & place of occurrence;

(b). The name and address of all hospitals, doctors, or practitioners who rendered treatment or examination because of any such injuries or diseases.

Response:

(a). The only injuries suffered prior to, was a injury to the Plaintiff's jaw on 5-12-04, at the C.U.O.P. center.

(b). Names unknown, but Plaintiff [REDACTED] was treated while at C.U.O.P. center, then went to Bayhealth Medical Center,

11). Have you, or anyone acting on your behalf, obtained from any person any statement, declaration, petition, or affidavit concerning this actions against Sgt. Wilbur Justice, Kent Raymond and Theresa DeMarco, OR it's subject matter? If so, state:

- (a). The name and last known address of each such person; and
- (b). When, where, by whom and to whom each statement was made, and whether it was reduced to writing or otherwise recorded.

Response:

(a) and (b). To both question Please see William Prettyman's Special Investigations Report, which each witness was interviewed by, on the days in the report, and all statements was recorded by Mr. Prettyman.

Date: January , 2008

Kenneth L. Holland  
Kenneth L. Holland #164800  
████████ DE - E-tier  
Delaware Correctional Center  
1181 Paddock Rd.  
Smyrna, Delaware, 19977

I hereby declare under penalty of perjury that the attached response defendant's Interrogatories are true and correct.

Kenneth Holland

In the United States District Court  
for the District of Delaware

Kenneth L. Holland,  
~Plaintiff~

C.A. No. 05-464-BLP

vs.

Stanley Taylor, et al.

Plaintiff's answer to Defendants second  
Request for Production of Document

Request 1:

grievances, complaints, or other correspondence relating to the subject matter in this request, has not been included because these document are not currently in Plaintiff's possession.

Request 2:

grievances, complaints, or other correspondence relating to the subject matter in this request, has not been included because these document are not currently in Plaintiff's possession.

Request 3:

All statement, declarations, [REDACTED] petitions, or affidavits relating to this subject matter, has been inclosed.

Request 4:

All medical records for Plaintiff relating to this subject matter, has been inclosed.

Request 5:

All documents identified or referenced in Plaintiff's response to Defendant's Second set of Interrogatories, has been inclosed.

Date; \_\_\_\_\_, 2008

Kenneth L. Holland  
Kenneth L. Holland #164800  
Delaware Correctional Center  
1181 Paddock Rd.  
Newark, Delaware 19711

I hereby declare under penalty of perjury that the attached Response to Defendant Interrogatories and Request for production are true and correct.

Kenneth Holland

Certificate of Service

I, Kenneth d. Nolland, hereby certify that I have served a true  
And correct cop(ies) of the attached: Answer to Defendants Interrogatories  
and Production of Document and Things upon the following  
parties/person (s):

TO: Office of the Clerk  
United States District Court  
844 N. King St., Lockbox 18  
Wilm, DE 19801-3570

TO: Catherine Damavandi  
Deputy Attorney General  
820 N. French St, 6<sup>TH</sup> Floor  
Wilm, DE 19801

TO: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

TO: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United  
States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this \_\_\_\_\_ day of January, 2008

INM: Kenneth Hollard  
SP# K4800 UNIT 8e  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DELAWARE 19977



U.S. MAIL  
X-RAY  
Office of the Clerk  
United States District Court  
844 N. King St., Postbox 18  
Lulmon, De 19801 ~ 3570